

ROBERT WISNIEWSKI & ASSOCIATES P.C.

ATTORNEYS-AT-LAW

225 BROADWAY, SUITE 612

NEW YORK, NY 10007

TEL: (212) 267-2101

FAX: (212) 587-8115

February 28, 2006

Hon. Joan M. Azrack
United States Magistrate Judge
United States District Court - Eastern District of NY
225 Cadman Plaza East
Brooklyn, NY 11201

VIA ECF AND HAND DELIVERY

Re: Godlewska et al. v. Human Development Association, Inc. et al.
Docket No: 03-CV-3985

Dear Judge Azrack:

I am co-counsel, along with Constantine Kokkoris, Esq., for the Plaintiffs in this action.

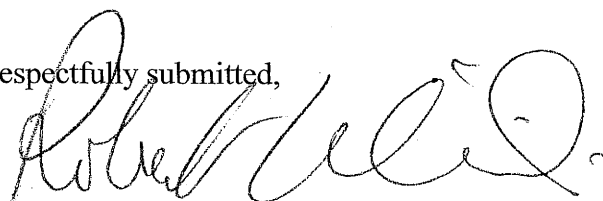
Attached please find two sets of copies of a fully-briefed Motion for Leave to Amend the Complaint, containing the following documents:

1. Notice of Motion for Leave to File and Serve a Second Amended Complaint
2. Text of Proposed Order
3. Declaration of Robert Wisniewski in Support of Plaintiffs' Motion for Leave and Serve a Second Amended Complaint
4. Plaintiffs' Memorandum of Points and Authorities in Support of Motion for Leave to Amend the Complaint
5. Memorandum of Law in Partial Opposition to Plaintiffs' Motion to Amend the Complaint by Defendant Human Development Association, Inc.
6. Text of Proposed Order by Defendant Human Development Association, Inc.
7. The City's Memorandum of Law in Opposition to Plaintiffs' Motion for Leave to Amend the Complaint to Add the City, HRA, and Eggleston as Defendant

8. Plaintiffs' Reply Memorandum of Law
9. Reply Declaration of Robert Wisniewski, Esq.

In addition, we are attaching the docket sheet, printed after our filing of the fully-briefed motion, which shows the docket entries from 62 through 65 for the instant motion. Pursuant to your chambers' permission, we have filed the motion this morning. As we explained to chambers, confusion arose by the defendants' previous filing of their opposition on the ECF system. We are dispatching a computer-savvy law clerk who filed the instant motion with a full set of documents to the clerk of the court as well, to alert the clerk of the previous filings and to resolve the situation.

Finally, it is respectfully noted that the parties agreed at the December 6, 2005 status conference to submit the Motion for Leave to Amend the Complaint to your Honor. Should you require a written confirmation, we will gladly obtain it.

Respectfully submitted,

Robert Wisniewski (RW-5308)

cc: Constantine Kokkoris, Esq
Co-counsel for Plaintiffs (Cover Letter, Docket Sheet and Plaintiffs' Reply only)

Ann P. Edelman, Esq.
Counsel for the HDA defendants (Cover Letter, Docket Sheet and Plaintiffs' Reply only)

Georgia Pestana, Esq.
Counsel for the proposed Municipal Defendants (Cover Letter, Docket Sheet and Plaintiffs' Reply only)

1:03-cv-03985-DGT-JMA Godlewska et al v. Human Development Association, Inc et al
David G. Trager, presiding
Joan M. Azrack, referral
Date filed: 08/12/2003 **Date of last filing:** 02/28/2006

History

Doc. No.	Dates	Description
<u>1</u>	<i>Filed:</i> 08/12/2003 <i>Entered:</i> 08/22/2003	Complaint
2	<i>Filed:</i> 08/29/2003 <i>Entered:</i> 09/04/2003	Summons Returned Executed
3	<i>Filed & Entered:</i> 09/12/2003	Stipulation and Order
4	<i>Filed & Entered:</i> 10/10/2003	Order
5	<i>Filed & Entered:</i> 10/14/2003	Letter
6	<i>Filed & Entered:</i> 10/15/2003	Letter
<u>7</u>	<i>Filed:</i> 11/14/2003 <i>Entered:</i> 11/20/2003	Amended Complaint
8	<i>Filed & Entered:</i> 12/15/2003	Order
9	<i>Filed:</i> 01/15/2004 <i>Entered:</i> 01/20/2004	Status Conference
<u>10</u>	<i>Filed & Entered:</i> 03/22/2004	Order
--	<i>Filed & Entered:</i> 04/13/2004	Case set to ECF status.
--	<i>Filed & Entered:</i> 04/13/2004	ECF registration forms have been mailed, so that all filings may be made electronically.
11	<i>Filed & Entered:</i> 04/13/2004	Order
12	<i>Filed:</i> 04/16/2004 <i>Entered:</i> 05/05/2004 <i>Terminated:</i> 07/18/2005	Motion to Dismiss
13	<i>Filed:</i> 04/16/2004 <i>Entered:</i> 05/05/2004	Memorandum in Support

<u>14</u>	<i>Filed:</i> <i>Entered:</i>	04/16/2004 05/05/2004	● Memorandum in Opposition
<u>15</u>	<i>Filed:</i> <i>Entered:</i>	04/16/2004 05/05/2004	● Affidavit
<u>16</u>	<i>Filed:</i> <i>Entered:</i>	04/16/2004 05/05/2004	● Reply in Support
<u>17</u>	<i>Filed:</i> <i>Entered:</i>	04/16/2004 05/05/2004	● Affidavit
<u>18</u>	<i>Filed & Entered:</i>	06/28/2004	● Notice (Other)
<u>19</u>	<i>Filed:</i> <i>Entered:</i>	07/20/2004 07/23/2004	● Status Conference
<u>20</u>	<i>Filed & Entered:</i>	08/30/2004	● Letter
<u>21</u>	<i>Filed & Entered:</i>	09/15/2004	● Letter
<u>22</u>	<i>Filed & Entered:</i>	09/24/2004	● Memorandum & Opinion
<u>23</u>	<i>Filed & Entered:</i>	01/03/2005	● Letter
<u>24</u>	<i>Filed & Entered:</i>	01/12/2005	● Order
<u>25</u>	<i>Filed & Entered:</i>	03/01/2005	● Notice (Other)
<u>26</u>	<i>Filed & Entered:</i>	03/09/2005	● Notice (Other)
<u>27</u>	<i>Filed & Entered:</i>	03/21/2005	● Consent to Become Party (Class Action)
<u>28</u>	<i>Filed & Entered:</i>	03/22/2005	● Consent to Become Party (Class Action)
<u>29</u>	<i>Filed & Entered:</i>	03/23/2005	● Consent to Become Party (Class Action)
<u>30</u>	<i>Filed & Entered:</i>	03/29/2005	● Consent to Become Party (Class Action)
<u>31</u>	<i>Filed & Entered:</i>	04/04/2005	● Consent to Become Party (Class Action)
<u>32</u>	<i>Filed & Entered:</i>	04/13/2005	● Consent to Become Party (Class Action)
<u>33</u>	<i>Filed & Entered:</i>	04/18/2005	● Consent to Become Party (Class Action)

<u>34</u>	<i>Filed & Entered:</i>	04/22/2005	● Consent to Become Party (Class Action)
<u>35</u>	<i>Filed & Entered:</i>	04/26/2005	● Consent to Become Party (Class Action)
<u>36</u>	<i>Filed & Entered:</i>	04/29/2005	● Consent to Become Party (Class Action)
<u>37</u>	<i>Filed & Entered:</i>	05/05/2005	● Consent to Become Party (Class Action)
<u>38</u>	<i>Filed & Entered:</i>	05/09/2005	● Consent to Become Party (Class Action)
<u>39</u>	<i>Filed & Entered:</i>	05/19/2005	● Consent to Become Party (Class Action)
<u>40</u>	<i>Filed & Entered:</i>	05/20/2005	● Answer to Interrogatories
<u>41</u>	<i>Filed & Entered:</i>	05/20/2005	● Response to Discovery
<u>42</u>	<i>Filed & Entered:</i>	06/14/2005	● Consent to Become Party (Class Action)
<u>43</u>	<i>Filed & Entered:</i>	06/20/2005	● Letter
<u>44</u>	<i>Filed & Entered:</i>	06/23/2005	● Consent to Become Party (Class Action)
<u>48</u>	<i>Filed: Entered:</i>	06/30/2005 07/12/2005	● Status Conference
<u>45</u>	<i>Filed & Entered:</i>	07/01/2005	● Consent to Become Party (Class Action)
<u>46</u>	<i>Filed & Entered:</i>	07/05/2005	● Consent to Become Party (Class Action)
<u>47</u>	<i>Filed & Entered:</i>	07/11/2005	● Consent to Become Party (Class Action)
<u>49</u>	<i>Filed & Entered:</i>	07/18/2005	● Order on Motion to Dismiss
<u>50</u>	<i>Filed & Entered:</i>	07/25/2005	● Consent to Become Party (Class Action)
<u>51</u>	<i>Filed & Entered:</i>	07/26/2005	● Consent to Become Party (Class Action)
<u>52</u>	<i>Filed: Entered:</i>	09/29/2005 10/06/2005	● Status Conference
<u>53</u>	<i>Filed: Entered:</i>	12/06/2005 12/13/2005	● Status Conference

<u>54</u>	<i>Filed & Entered:</i>	01/11/2006	Letter
<u>55</u>	<i>Filed & Entered:</i>	01/17/2006	Order
<u>56</u>	<i>Filed & Entered:</i>	02/03/2006	Motion for Leave to File
<u>57</u>	<i>Filed & Entered:</i>	02/03/2006	Memorandum in Opposition
<u>58</u>	<i>Filed & Entered:</i>	02/03/2006	Affidavit of Service
<u>59</u>	<i>Filed & Entered:</i>	02/14/2006	Order
<u>60</u>	<i>Filed & Entered:</i>	02/17/2006	Motion to Adjourn Conference
<u>61</u>	<i>Filed & Entered:</i>	02/23/2006	Order
<u>62</u>	<i>Filed & Entered:</i>	02/28/2006	Motion to Amend/Correct
<u>63</u>	<i>Filed & Entered:</i>	02/28/2006	Response in Opposition to Motion
<u>64</u>	<i>Filed & Entered:</i>	02/28/2006	Response in Opposition to Motion
<u>65</u>	<i>Filed & Entered:</i>	02/28/2006	Reply to Response to Motion

PACER Service Center			
Transaction Receipt			
02/28/2006 12:24:51			
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